

## **POST INSPECTION MEMORANDUM**

**Inspector:** Kuang Chu, UTC

**Reviewed:** Joe Subsits, UTC

**Peer Reviewed:** \_\_\_\_\_

**Follow-Up Enforcement:** No Violation

**PCP\* PCO\* NOA WL LOC**

**Director Approval\*** Chris Hoidal

**Date:** September 3, 2012

**Operator Inspected:** Olympic Pipe Line Company    **OPID:**30781    **Region:** Western

**Unit Address:**

2201 Lind Ave. SW, Suite 270  
Renton, WA 98055

**Unit Inspected:** Olympic Pipe Line - North

**Unit ID:** 925

**Unit Type:** Interstate Hazardous Liquid

**Inspection Type:** I01 – Unit Inspection, I07 – IMP Field Verification & Follow-up, and I08 - OQ Protocol #9 Field Verification

**Record Location:** Renton, WA

**Inspection Dates:** August 20 – 24, 2012

**AFOD:** 5 (I01-4, I07-0.5, I08-0.5)

**SMART Activity Number:**

**Operator Contact:** Jim Bruen

**Phone:** 630 536-2535    **Fax:** 630 420-5519    **Emergency:** 888-271-8880

**Unit Description:** The unit consists of a 5-mile long 16" line transporting refined petroleum products from BP Cherry Point refinery to the Ferndale Pump Station. At the Ferndale Pump Station, the pipeline receives additional products from Phillips 66 refinery. The 16" line runs southward for 37.5 miles from Ferndale Pump Station to Bayview Products Terminal, then continues 1.2 miles to Allen Station. At Anacortes, the station receives refined products from Tesoro refinery and Shell refinery. A 9-mile long 16" line transports the refined products from Anacortes to Bayview Products Terminal and continues to Allen Station. A 20" line runs from Allen Station to Renton Station for a distance of 75.5 miles. A 16" line runs 49.2 miles from Allen Station to Woodinville Station and continues south for 26.3 miles to Renton Station.

**Facilities Inspected:** The pump stations at Cherry Point, Ferndale, Anacortes, Allen, Woodinville, and Renton were inspected. The pump station inspections included a review of the firefighting equipment, mainline pumps, atmospheric corrosion, facility security, signs, valve maintenance and security, launchers and receivers, pipe supports, and pressure controlling devices. The Bayview Products Terminal was also inspected. The breakout tanks at Bayview Products Terminal, Allen Station, Anacortes Station, and Renton Station were inspected. The

right-of-way (ROW) inspection included ROW condition, mainline valves, rectifiers, CP test stations, casings, line markers and warning signs.

**Persons Interviewed:**

Persons Interviewed	Titles	Phone No.
Jim Bruen	DOT Compliance Advisor	(630)-779-6994
Kurt Hayashida	NW E&M Team Leader	(425)-226-8881
Ken Carlton	Central Area Team Leader	(425)-235-7711
James Fraley	Damage Prevention Team Leader	(360)-957-0203
Dennis Johnston	North Team Leader	(360)-815-0345

**Probable Violations/Concerns:** There are two concerns as follows:

1. **49 CFR §195.432 Inspection of in-service breakout tanks.**  
(b) *Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel aboveground breakout tanks according to API Standard 653 (incorporated by reference, see § 195.3).*

***API 653 6.3 Inspections from the Outside Of The Tank***

*6.3.1.3 This routine in-service inspection shall include a visual inspection of the tank's exterior surfaces. Evidence of leaks; shell distortions; signs of settlement; corrosion; and condition of the foundation, paint coatings, insulation systems, and appurtenances should be documented for follow-up action by an authorized inspector.*

**Finding(s):**

The seal between the bottom of the chime and concrete ring wall for breakout tank T-117 in Anacortes failed at several locations. This allows rain water to be trapped under the chime and can lead to corrosion. The sealant was injected under the chime a few years ago and it failed again. A suitable sealant with proper installation procedures would be required to assure a long lasting application.

Post inspection notes: The failed seal under the entire chime was removed and a new sealant was applied on 8/28/2012. Several photos were taken and forwarded to the inspector for records.

2. **49 CFR §195.430 Firefighting equipment.**  
*Each operator shall maintain adequate firefighting equipment at each pump station and breakout tank area. The equipment must be:*  
(a) *In proper operating condition at all times;*

**Finding(s):**

The monthly inspection tags for one portable fire extinguisher at Allen Station and one at Bayview Products Terminal were missing. The monthly inspection tag for one portable

fire extinguisher at Bayview Products Terminal was not marked for the month of July 2012.

Post inspection notes: The missing monthly inspection tags at Allen Station and Bayview Products Terminal were reattached to the fire extinguishers on August 27 & 28, 2012. The missed marking for the month of July for one fire extinguisher at Bayview Products Terminal was remarked as all the fire extinguishers were inspected by an independent inspector in July 2012.

**Follow up on the history of prior offenses that are still open:**

<b>Prior Offenses</b> (for the past 5 years)		
<b>CPF #</b>	<b>What type of open enforcement action(s)?</b>	<b>Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)</b>

**Recommendations:** Continue to inspect this unit every other year.

**Comments:** The thermal relief valve (TRV) for the 20" pig launcher at the Allen Station was erroneously reset to 925 psi in 2010 while the system MOP is 928 psi. The frequent relief caused the piping to vibrate. The sampling port failed on 3/31/2012 and the pressure gage failed on 4/1/2012 as a result of vibration. Both incidents caused spills of product from the system. The root cause analysis identified the wrong set point for the TRV as the primary reason of the failure and subsequent spills. The set point was reset to 1.06 times of MOP (928 psi) and is now at 984 psi. The TRV will open only under shut-in condition while the system is under no-flow condition and the product temperature is elevated due to radiation from sun.

**Attachments:**

- Field data collection form
- Western Region Unit Information

Version Date: 5/5/08